



March 14, 2005

1617 Boylston Avenue, Suite 201
Seattle, WA 98122
206.343.3074
206.709.8218 (fax)
info@livablecoalition.org
www.livablecoalition.org

Hon. Mayor Nickels
Seattle City Hall, 600 Fourth Avenue, 7th Floor
PO Box 94749
Seattle, WA 98124-4749

**RE: Critical Areas Ordinance Update Recommendations,
Chapter 25.09, Seattle Municipal Code**

Dear Hon. Mayor Nickels and Staff:

*Protecting,
Restoring
and
Maintaining
Healthy,
Equitable
and
Sustainable
Communities
In King
County*

Livable Communities Coalition is a broad-based coalition of neighborhood, affordable housing, transportation, land-use, and environmental advocates in the King County region. We advocate for and promote healthy, equitable, and sustainable communities, believing in protection of and access to clean water and air, open space, forests, farmlands and wildlife habitat for all citizens. LCC is a coalition of 25 other organizations with many individual members in the City of Seattle.

Seattle's Chapter 25.09, Critical Areas Ordinance, should protect property, water quality, and human safety (from flooding and erosion), while including flexibilities to ensure responsible development and saving taxpayers money in the long run from the costly mechanical control of functions nature performs for free.

BOARD of DIRECTORS

Janice Cannon-Kyte

Allen Cox

John Healy

Jennifer Joseph

Paul Kampmeier

Matt Mega

Aaron Ostrom

Gina Stark

Paul Wiesner

Thank you for the opportunity to submit our following recommendations; we hope they are of assistance. Please include them in the official record.

We strongly support:

- Language clearly stating the purpose of the ordinance, namely: "It is expressly the purpose of this chapter to provide for and promote the health, safety and welfare of the general public" (SMC 25.09.010).
- Language allowing nomination of species and habitats of local importance (SMC 25.09.200 (E)).
- Use of a current wetland rating system, DOE Publication #04-06-25 (SMC 25.09.160 (A)).

- The use of scientifically-based wetland mitigation replacement ratios (SMC 25.09.160 (F)(5)(a)).

In order to better protect public health, safety and general welfare, we would like to add the following five major suggestions for improving SMC 25.09:

1. STRENGTHEN WETLAND PROTECTION

■ *Isolated and smaller wetlands need protection*

SMC 25.09.020 C only regulates wetlands larger than 100 square feet (Categories I, II, and III) and Category IV wetlands larger than 1,000 square feet. This language should be eliminated, since such smaller and/or isolated wetlands provide important habitat functions. Filling wetlands as an exemption will result in a net loss of functions and values and, therefore, runs counter to case law^{1,2} and to the Growth Management Act (GMA)³. Such filling would also be in conflict with City of Seattle Comprehensive Plan Policies, including E28 and E36:

E28 Encourage the preservation and maintenance of existing natural habitat in areas on private property undergoing development, both on-land and in-water, and consider mitigation requirements if damage is unavoidable.

E36 Consider best available science in making decisions regarding habitat preservation and restoration efforts.

Furthermore, smaller wetlands provide functions and values—and Seattle has a state mandate to protect those functions and values regardless of if they are equivalent to or connected to larger systems. Best available science counters some assumptions that may underlie SMC 25.09.020 (emphasis added):

As with exempting a certain wetland size, there is no scientific basis for exempting wetland impacts under any particular size without an analysis of the cumulative effects of the exemption. A study of the management

¹ Pilchuck Audubon Soc’y v. Snohomish Cty [Pilchuck II], CPSGMHB Case No. 95-3-0047c, Final Decision and Order P. *21, 1995 WL 903206, *21 (December 6, 1995).

² Tribes v. Snohomish County [Tulalip], CPSGMHB Case No. 96-3-0029, FDO, January 8, 1997, 13.

³ RCW 36.70A

area is needed in order to measure the net result of the exemption as applied over time.⁴

There is absolutely no scientific justification for exempting isolated wetlands from regulation (Volume 1, Chapter 5). Isolated wetlands are generally defined as those wetlands that are hydrologically isolated from other aquatic features. Hydrologic isolation is not a determinant factor in the function of wetlands. Isolated wetlands in Washington perform many of the same important functions as other wetlands, including recharging streams and aquifers, storing flood waters, filtering pollutants from water, and providing habitat for a host of plants and animals. Many wildlife species, including amphibians and waterfowl, are particularly dependent on isolated wetlands for breeding and foraging.⁵

■ ***Wetland buffers widths are inadequate to protect wetland functions and values***

A state report from August 2004 notes that despite the wetland regulatory programs in place, the data show that impacts continue and that we have not achieved the federal and state goal of “no net loss.”⁶ Buffers in SMC 25.09.160 (E)(1)(d) should be increased to adequate distances given in the scientific literature. As required by the Washington State Growth Management Act (RCW 36.70A), Best Available Science (BAS) must be incorporated into the update of all Critical Areas Ordinances; proposed wetland buffer numbers cast some doubt into the rigor of the City of Seattle’s BAS report. We encourage a further investigation of the Washington State Office of Community Development’s list of BAS citations⁷. We also suggest that criteria from State of Washington Department of Community Trade and Economic Development’s (CTED’s) *Example Code Provisions for Designating and Protecting Critical Areas*⁸ be incorporated. If a deviation from BAS is desired, a full documentation of reasons should be provided. Major discrepancies in state recommendations and SMC are noted in the following tables:

⁴ Washington State Department of Ecology. August 2004 Draft. Wetlands in Washington State Volume 2: Managing and Protecting Wetlands. Washington State Department of Ecology Publication # 04-06-024. Section 8.3.3.2.

⁵ Ibid. Section 8.3.3.3.

⁶ Ibid. Section 3.1.

⁷ Washington State Office of Community Development. March 2002. Citations of Recommended Sources of Best Available Science For Designating and Protecting Critical Areas
http://www.cted.wa.gov/uploads/BAS_Citations_Final.pdf

⁸ State of Washington Department of Community Trade and Economic Development. 2003. Critical Areas Assistance Handbook: Protecting Critical Areas Within the Framework of the Washington Growth Management Act. Appendix A: *Example Code Provisions for Designating and Protecting Critical Areas*.
http://www.cted.wa.gov/uploads/Appendix_A.pdf.

Department of Ecology Wetland Buffer Recommendations

Intensity of Use	Wetlands Category			
	Category 1	Category 2	Category 3	Category 4
High	300 feet	200 feet	100 feet	50 feet
Moderate	250 feet	150 feet	75 feet	35 feet
Low	200 feet	100 feet	50 feet	35 feet

City of Seattle Proposed Wetland Buffers

	Wetlands Category			
	Category I	Category II	Category III	Category IV
Standard Buffer	100 feet	100 feet	60 feet	50 feet
With allowed reductions	70/80 feet	70/80 feet	40/50 feet	35 feet

The City of Seattle uses buffer distances for the larger and more important wetlands that are significantly smaller than those recommended by the state. This is a particular concern for us, since this deviates substantially from the best available science. The best available science supports Category I buffers in a range from 200 to 300 feet, depending on land use intensity; the City of Seattle uses a distance less than half of that supported by BAS for low intensity land uses and, for Category II wetlands, a distance at the bare minimum for low intensity land uses.

While buffers aren't the only means of protection, it is clear from the science that they are of paramount importance. Case law is clear that urban wetlands should be given the same kind of protection as rural wetlands:

The GMA requires designation and protection of critical areas and makes no qualifying statement that, for example, urban wetlands are any less important or deserving of protection than rural ones. As a practical matter, past development practices may have eliminated and degraded wetlands in urban areas to a greater degree than rural areas, but the Board rejects the reasoning that this provides a GMA rationale for not protecting what is left⁹.

⁹ Central Puget Sound Growth Management Hearings Board. *Pilchuck II*, 5347c, FDO, at 23.

The requirement that critical areas are to be protected in the urban area is not inconsistent with the Act's predilection for compact urban development¹⁰.

The City's wetland proposal is also in conflict with the City of Seattle Comprehensive Plan. Aside from EG 36 mentioned above, Comprehensive Planning Policy EG6 is relevant:

EG6 Work to maintain or improve water quality, through appropriate land use and transportation policies.

The City must provide evidence in the record as to the reasons for deviating from the best available science and actions taken to address potential risks to critical area functions and values (see WAC 365-195-915). Relying on previously established standards is unacceptable. We strongly recommend increases in buffer distances to comply with state recommendations and best available science. We would also strongly recommend investigating DOE's Alternative 3 buffer method, which determines buffer distances by the functions that the rated wetlands perform.

■ ***Wetland buffer reductions should not be allowed***

Given adequate limits, we support buffer averaging as a flexibility tool. But the given lack of scientific support for wetland reduction in general—and given a reduction of down to 35 feet in the current draft code, we suggest that SMC 25.09.160 (E)(2) be removed.

■ ***Wetland buffer averaging needs stronger limitations***

Current baseline buffer distances for buffer averaging threaten to impact wetland functions and values. Again, we support the concept of buffer averaging and are encouraged that you have proposed some limitations. These limits, however, need to comply with best available science.

■ ***Mitigation replacement ratios should not be decreased***

Mitigation success rates, as documented by scientific studies and state BAS documents, are often very low. Likewise, BAS documents note that mitigation has resulted in lost acreage, wetland types, and wetland functions (Castelle et al., 1992b; Ecology, 2001; Mockler et al., 1998). The City of Seattle has proposed

¹⁰ Ibid, at 24.

replacement ratios supported by recent scientific synthesis documents¹¹. We strongly support these replacement ratios. We are concerned, however, that the Director has discretion to decrease these important mitigation ratios “when the proposed mitigation actions are conducted in advance of the impact and result in no net loss in wetland functions” (SMC 25.09.160 (F)(5)(c)). Since some wetland functions and values take considerable time to establish (or re-establish) and monitoring does not incorporate such extended time periods, we suggest removing this provision so as to avoid no net loss.

■ ***Mitigation sequencing language needs improvement***

SMC 25.09.160 (F) details mitigation and avoidance standards. The City has proposed the following preferential order:

- a. avoid the impact to the extent practicable by not taking all or part of an action;
- b. keep the impact to a minimum by limiting the degree or magnitude of the action and its implementation, and by taking affirmative actions to mitigate the impact over time; and
- c. mitigate unavoidable impacts to the designated uses of a wetland by replacement, enhancement, or other approved compensation methods.

While we agree with the general concept and order of 1) avoid, 2) minimize, and 3) mitigate, we suggest language drafted by state agencies and based on best available science:

Mitigation Sequencing. Applicants shall demonstrate that all reasonable efforts have been examined with the intent to avoid and minimize impacts to critical areas. When an alteration to a critical area is proposed, such alteration shall be avoided, minimized, or compensated for in the following sequential order of preference:

- A. Avoiding the impact altogether by not taking a certain action or parts of an action;
- B. Minimizing impacts by limiting the degree or magnitude of the action and its implementation, by using appropriate technology, or by taking affirmative steps, such as project redesign, relocation, or timing, to avoid or reduce impacts;

¹¹ See Table 9 on page 15 of Appendix 8-C: Washington State Department of Ecology. August 2004. Wetlands in Washington State Volume 2: Managing and Protecting Wetlands. Washington State Department of Ecology Publication # 04-06-024. Available at: http://www.ecy.wa.gov/programs/sea/bas_wetlands/vol2/Appendix%208-C%20external%20review%20draft.pdf.

- C. Rectifying the impact to wetlands, critical aquifer recharge areas, frequently flooded areas, and habitat conservation areas by repairing, rehabilitating, or restoring the affected environment to the historical conditions or the conditions existing at the time of the initiation of the project;
- D. Minimizing or eliminating the hazard by restoring or stabilizing the hazard area through engineered or other methods;
- E. Reducing or eliminating the impact or hazard over time by preservation and maintenance operations during the life of the action;
- F. Compensating for the impact to wetlands, critical aquifer recharge areas, frequently flooded areas, and habitat conservation areas by replacing, enhancing, or providing substitute resources or environments; and
- G. Monitoring the hazard or other required mitigation and taking remedial action when necessary.

Mitigation for individual actions may include a combination of the above measures.¹²

2. STRENGTHEN STREAM AND RIPARIAN AREA PROTECTION

■ *Stream buffers are far too narrow to protect the functions and values of riparian areas*

SMC 25.09.200 (A)(3) requires buffers of as low as 35 feet, while the best available science supports buffers between 150 and 250 feet. The City is also choosing not to protect shorelines until the update of the SMP; we strongly urge the City to adopt a buffer for Type 1 waters until the SMP update is approved by DOE.

¹² State of Washington Department of Community Trade and Economic Development. 2003. Critical Areas Assistance Handbook: Protecting Critical Areas Within the Framework of the Washington Growth Management Act. Appendix A: *Example Code Provisions for Designating and Protecting Critical Areas*, Page A-22. http://qa.cted.wa.gov/CTED/documents/ID_958_Publications.pdf.

Department of Ecology Riparian Buffer Recommendations

Stream Type—Buffer Distances			
Type 1	Type 2	Type 3	Type 4 & 5
250 feet	250 feet	200 feet (fish bearing & 5-20 feet)	150 feet (low mass wasting)
		150 feet (fish bearing & < 5 feet)	225 feet (high mass wasting)

City of Seattle Riparian Buffer Proposed Regulations

Stream Type				
Type 1	Type 2	Type 3	Type 4	Type 5
0 feet	50 feet	50 feet	35 feet	35 feet

As shown above, the City of Seattle's stream buffers are significantly less than those supported by the state and best available science. We are concerned that while "limited development areas" meet stormwater requirements, impervious surface limits, and vegetation retention requirements, they do not perform the same functions necessary to protect the functions and values of critical areas. For instance, when stormwater discharges reduce buffer effectiveness:

[V]egetated buffers are only effective at removing sediments if sediment-laden waters enter the buffer as sheet flow, rather than in channels or rivulets (Phillips 1989, Booth 1991, Castelle et al. 1992, Desbonnet 1994, Belt and O'Laughlin 1994, Sheridan et al. 1999).

In his research in urbanizing settings, Booth (1991) notes that buffers adjacent to aquatic resources may have limited ability to filter and slow flows caused by stormwater. He found (1) in some instances the buffers no longer existed in a natural vegetated condition, or (2) once development occurred and the buffer was subdivided into multiple private ownerships, maintaining an intact buffer was not possible, or (3) the increased volumes and rates of flows were too significant to be controlled by conditions within a vegetated buffer.¹³

¹³ Sheldon, D., T. Hruby, P. Johnson, K. Harper, A. McMillan, S. Stanley, E. Stockdale. August 2003 Draft. Freshwater Wetlands in Washington State Volume 1: A Synthesis of the Science. Washington State Department of Ecology Publication # 03-06-016.

Not only do stream buffers perform necessary habitat functions, but they help protect human drinking water, aid in flood protection, and help account for special consideration for anadromous fisheries, as required in the 1995 GMA amendments. A 35-foot buffer provides negligible functions, according to the best available science, and will not provide for the state mandate (and CAO regulation) of no net loss to stream functions. Such stream buffers are also contradictory to City of Seattle Comprehensive Plan Policies EG 6, EG 8, EG 9, and EG 36 (emphasis added):

EG6 Work to maintain or improve water quality, through appropriate land use and transportation policies.

EG8 Strive to increase the amount of total pervious surface and vegetative cover in the city, to promote groundwater replenishment where desirable and decrease surface water runoff and the pollution it collects from roads, rooftops and sidewalks.

EG9 Promote policies to reduce water quality degradation from landscaping, animal waste, construction, and industrial sites.

E36 Consider best available science in making decisions regarding habitat preservation and restoration efforts.

Buffers larger than those provided are required—greater than 100 feet in most cases—are necessary for reasonable sediment control,¹⁴ nutrient removal,^{15,16,17,18} pathogen removal,¹⁹ and wildlife habitat,^{20,21,22,23,24,25} among other valued functions.

¹⁴ Sheldon, D., T. Hruby, P. Johnson, K. Harper, A. McMillan, S. Stanley, and E. Stockdale. Freshwater Wetlands in Washington State, Volume 1: A Synthesis of the Science. Washington State Department of Ecology Publication #03-06-016.

¹⁵ McMillan, A. 2000. *The Science of Wetland Buffers and Its Implication for the Management of Wetlands*. M.S. Thesis. Olympia, WA: The Evergreen State College.

¹⁶ Castelle and Johnson. 2000. *Riparian Vegetation Effectiveness*. National Council for Air and Stream Improvement. Technical Bulletin #799.

¹⁷ Belt, G.H. and J. O’Laughlin. 1994. Buffer strip design for protecting water quality and fish habitat. *Western Journal of Applied Forestry* 9(2): 41-45.

¹⁸ McMillan, A. 2000.

¹⁹ Sheldon, et al. 2003.

²⁰ Castelle, A.J., C. Conolly, M. Emers, E.D. Metz, S. Meyer, M. Witter, S. Mauermann, M. Bentley, D. Sheldon, and D. Dole. 1992. *Wetland Mitigation Replacement Ratios: Defining Equivalency*. Publication No. 92-08. Olympia, WA: Washington Department of Ecology.

²¹ Chase, V., L. Deming, and F. Latawiec. 1995. *Buffers for Wetlands and Surface Waters: A Guidebook for New Hampshire Municipalities*. Concord, NH: Audubon Society of New Hampshire.

²² Fischer, R.A., C.O. Martin, and J.C. Fischenich. 2000. Improving riparian buffer strips and corridors for water quality and wildlife. In P.J. Wigington and R.L. Beschta, *Riparian Ecology and Management in Multi-Land Use Watersheds*. American Water Resources Association.

Recent findings on floodplain management, as well, illustrate the importance of protecting human safety and property with adequate buffers:

It is the latter reason, viz., habitat protection, that has spurred countless Washington communities to define buffers, usually through the Fish and Wildlife Habitat Conservation Areas section of local CAOs. These buffers often encompass areas larger than identified floodways; on smaller streams, they normally are wider than the floodway. This provision is perhaps the most effective floodplain management practice in the State at this time.²⁶

We encourage you to take the best available science into account and make serious increases to riparian buffers.

■ ***Limitations to use of pesticides and fertilizers near streams need detailing in SMC 25.09***

While we believe that the City of Seattle is on the right track in limiting reliance on fertilizers and herbicides. We understand that the City was considering a limitation on pesticide applications within 200 feet of streams as of June, 2004²⁷. Aside from language prohibiting transmission into “adjacent water bodies,” SMC 25.09.200 (B)(5)(a) should limit application within a certain science-based distance from streams.

■ ***Stream typing should be done in accordance to the Washington State Department of Natural Resources new lettering system***

Instead of using stream typing that is specific to Seattle, we suggest that you use the WDNR lettering system. This will allow for a more accurate and reasonable designation of stream types and, subsequently, better protection of stream functions and values.

While an adaptive management approach allows for possible changes, integrating this new lettering system—as other jurisdictions are doing—would streamline the

²³ Groffman, P.M., A.J. Gold, T.P. Husband, R.C. Simmons, and W.R. Eddleman. 1991. *An Investigation into Multiple Uses of Vegetated Buffer Strips*. Narragansett Bay Project No. NBP-91-63. Providence, RI.

²⁴ Howard, R.J. and J.A. Allen. 1989. *Streamside Habitats in Southern Forested Wetlands: Their Role and Implications for Management*. U.S. Forest Service.

²⁵ McMillan. 2000.

²⁶ Washington State Department of Ecology. February 2004. *Floodplain Management in the State of Washington A Status Report as of February 2004*. Page 10.

²⁷ Available in draft form at: <http://www.cityofseattle.net/council/compcreeksord.pdf>.

process, allow for easier use by the development community, and result in better and more updated protections.

3. IMPROVE FISH AND WILDLIFE HABITAT CONSERVATION AREAS PROTECTION

- ***Other fish and wildlife habitat conservation areas, aside from those assigned, should be protected***

We support the designation of habitats as Fish and Wildlife Habitat Conservation Areas. If applicable, protections for the following fish and wildlife habitat conservation areas should be included in SMC 25.09, as informed by best available science and recommended by the Washington State Department of Natural Resources and CTED:

- Herring and Smelt Spawning Areas.
- Naturally Occurring Ponds under Twenty Acres.
- Waters of the State.
- Lakes, Ponds, Streams, and Rivers Planted With Game Fish by a Governmental or Tribal Entity.
- State Natural Area Preserves and Natural Resource Conservation Areas.
- Areas of Rare Plant Species and High Quality Ecosystems.
- Land Useful or Essential for Preserving Connections Between Habitat Blocks and Open Spaces.

By protecting a full range of species and habitats, the City of Seattle will be adhering to Comprehensive Plan Policies, including:

EG16 Where suitable habitat potential exists, work to maintain and enhance Seattle's urban forests and wildlife habitats and the plants and animals native to the region.

E29 Strive to actively manage the forested areas within Seattle's parks, acquired open spaces, and rights-of-way as the first priority in urban forest maintenance and enhancement efforts.

EG17 Protect the habitat of native and migratory wildlife by encouraging open space conservation and beneficial habitat and providing for the growth of native species of trees and other native vegetation.

EG19 Strive to achieve a net increase of healthy, diverse tree cover throughout the city.

E28 Encourage the preservation and maintenance of existing natural habitat in areas on private property undergoing development, both on-land and in-water, and consider mitigation requirements if damage is unavoidable.

■ ***Strengthen fish and wildlife protection through conditioning of development***

SMC 25.09.200 (D) allows the Director to condition development to encourage protecting fish and wildlife habitats. While we support this concept, a stronger approach is necessary in order to insure the protection of these critical area functions and values. We strongly suggest changing “may” to “shall.”

■ ***Develop further pervious strategies and incentives***

SMC 25.09.200 (B)(5)(c) keeps impervious surfaces in Shoreline districts to a minimum by using permeable surfacing. We strongly support such a cost-effective approach to surface water runoff and encourage the City to use it in all districts by developing a more detailed incentive program for LID.

4. ADDRESS ADDITIONAL CONCERNS

■ ***Increase penalties for violations***

SMC 25.09.460 details civil penalties for noncompliance that shall not exceed \$500. While we are encouraged that a penalty is included and referenced in the language of SMC 25.09, we feel strongly that the penalty should fit the violation and discourage noncompliance. Given major impacts to critical areas around the Puget Sound region, other jurisdictions have increased fines to \$3000 per violation per day (see the City of Edmonds, for example). We suggest a similar increase to assure the protection of critical areas—and the health and human safety of the citizens—of Seattle.

An increase for “violations causing significant damage” is not specific enough and, if this method is used, we suggest further elaboration.

■ ***Remove setback reduction allowance***

SMC 25.09.280 allows for the Director to authorize a 25 percent reduction in yard or setback requirements to maintain the full width of a riparian management area, wetland or steep slope buffer. Because the setback protects the buffer so it can effectively protect critical area functions and values, we suggest removing this allowance.

■ ***Remove the small project waiver***

SMC 25.09.055 allows for the Director to approve new additions or structures in critical areas and buffers under certain circumstances. We suggest removing this language, so that the cumulative net loss of functions and values can be avoided through proper mitigation techniques.

■ ***Clarify site clearing “minimum”***

SMC 25.09.60 (E) requires, among other things, that site clearing “be kept to the minimum for construction.” While we agree with this in principle, we have a hard time understanding how such a requirement will be applied and to the meaning of “minimum.” We suggest further clarification or reference to BMPs.

5. CONSIDER THE PRECAUTIONARY PRINCIPLE

It is more efficient and cost-effective to prevent environmental damage than to repair it later²⁸, and a “low risk” strategy, based upon the best available science, will provide the best chance for protecting critical areas. This basic principle of conservation biology is known as the “precautionary principle.”²⁹ WAC 365-195-920 supports this approach and advises that where cities lack scientific information, they should take a precautionary or “no risk” approach in which development and land use activities are strictly limited until the uncertainty is sufficiently resolved. WAC 365-195-920 also advises local governments to employ an effective adaptive management program that relies on scientific methods to evaluate how well regulatory and non-regulatory actions will achieve their objectives, and can make timely programmatic changes in response to that feedback. The guidelines further advise that the feedback loop from management results should operate quickly enough to be able to detect deficiencies in the program and correct them before the resource is placed at risk.

Incorporating the precautionary principle (WAC 365-195-920) will enable the City of Seattle to effectively protect critical areas now and into the future to ensure no net loss of critical area function and value and protect the livability and quality of life for all Seattle residents.

Thank you for your commitment to the protection of Seattle’s critical areas and the health and general welfare of our members and all citizens; we hope you use this opportunity to

²⁸ Weiss, Edith Brown, Ed. 1992. Environmental change and international law: New challenges and dimensions. United Nations University Press, The United Nations University. 493 pages.

²⁹ Noss, Reed F. et al. 1997. The Science of Conservation Planning: Habitat Conservation under the Endangered Species Act. Island Press

incorporate our comments and set a superior example for other municipalities in the region.

We thank you for the opportunity to submit our comments. Feel free to contact us with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "John Mauro". The signature is fluid and cursive, with a large initial "J" and a long, sweeping underline.

John Mauro
Director

cc: Miles Mayhew, DPD, miles.mayhew@seattle.gov
cc: Diane Sugimura, Director, DPD diane.sugimura@seattle.gov